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Attorneys for Plaintiff, Keith Hacker in Superior Court (OCN-L-3112-19)

JUL 16 2021

U.S. BANKRUPTCY COURT
TRENTON, NJ
BY John D. Borbi DEPUTY

P A I D
B 188.00
R# 624417

In Re:

CARLOS JAIME-VALDEZ

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (Trenton)
CASE NO.: 21-14025

Chapter 7

NOTICE OF MOTION GRANTING RELIEF
FROM AUTOMATIC STAY TO ALLOW
MOVING PARTY TO PROCEED WITH
LITIGATION IN THE SUPERIOR COURT OF
NEW JERSEY

TO: Attorney for Debtor: Robert C. Nisenson, Esquire
Law Offices of Robert C. Nisenson, LLC
10 Auer Court
East Brunswick, New Jersey 08816

Trustee: Bunce D. Atkinson, Chapter 7 Standing Trustee
1011 Highway 71 - Suite 200
Spring Lake, New Jersey 07762

Attorney for Debtor
in Superior Court case: Carlos Jaime-Valdez c/o Thomas J. Giardina, Esquire
Goldberg, Miller & Rubin
999 Riverview Drive - Suite 201
Totowa, New Jersey 07512

Debtor: Carlos Jaime-Valdez
13 Harrison Street
Sayreville, New Jersey 08875

PLEASE TAKE NOTICE that the undersigned attorney for Plaintiff, Keith Hacker in Superior Court (OCN-L-3112-19), will apply to the United States Bankruptcy Court, for the District of New Jersey at the Court House located at 402 E. State Street, Trenton, New Jersey 08608 on Tuesday, August 17, 2021 at 10:00 a.m. before the Honorable Kathryn C. Ferguson, for an Order lifting the stay on the litigation presently pending in the Superior Court of New Jersey, Law Division, Ocean County under Docket No.: OCN-L-3112-19, on behalf of Carlos Jaime-Valdez.

In support of the above application, Keith Hacker will rely upon the Certification attached hereto. A proposed form of Order is also provided. Oral Argument is not requested at this time.

BORBI, CLANCY & PATRIZI
Attorneys for Plaintiff-Superior Court Litigation

John D. Borbi
JOHN D. BORBI, ESQUIRE

Dated: July 15, 2021



LAW OFFICES
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Marlton ♦ Philadelphia

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+ Of Counsel

Assistant: CMeighan@bpbclaw.com

July 15, 2021

Clerk, Motions
United States Bankruptcy Court
402 East State Street
Trenton, New Jersey 08608

Re: In the Matter of Carlos Jaime-Valdez
Chapter 7 Case # 21-14025-KCF
Our Case: Keith Hacker vs. Carlos Jaime-Valdez
Docket #: OCN-L-3112-19
Our File: 18/110

Dear Clerk:

Enclosed please find an original and one copy of a Notice of Motion granting relief from the automatic stay to allow moving party to proceed with litigation in the Superior Court of New Jersey along with a Certification in Support of Motion, Proof of Mailing and an original and two copies of a proposed Order.

Also enclosed is our firm's check in the amount of \$188.00 for the filing fee related to this motion made payable to "U.S. Bankruptcy Court for the District of New Jersey."

Please note that the Debtor is being sent this Motion via regular and certified mail, return receipt requested. Upon receipt of the green card, our office will file it immediately with the Bankruptcy Court Clerk.

Respectfully submitted,

BORBI, CLANCY & PATRIZI

JOHN D. BORBI (jborbi@bpbclaw.com)

JDB/cbm
Enclosures

cc: Hon. Kathryn C. Ferguson, United States Bankruptcy Court
Robert C. Nisenson, Esquire (Attorney for Debtor)
Bunce D. Atkinson, Chapter 7 Standing Trustee
Thomas J. Giardina, Esquire (Attorney for Debtor in Superior Court case)
Carlos Jaime-Valdez (Regular & certified mail, R.R.R. # 7019 0700 0000 5152 1066)

COMMITTED TO PROTECTING THE INJURED